

DOCUMENT CONTAINS INFORMATION
DESIGNATED AS CONFIDENTIAL SUBJECT TO THE
MARCH 30, 2004 CONFIDENTIALITY PROTECTIVE
ORDER AND THE FEBRUARY 19, 2010 SEALING
ORDER, IN RE SEPTEMBER 11 LITIGATION, 21 MC
101 (AKH), 08 CIV 3719 (AKH), 08 CIV (AKH)
DO NOT COPY OR DISCLOSE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE SEPTEMBER 11 LITIGATION

21 MC 101 (AKH)

-----X
WORLD TRADE CENTER PROPERTIES LLC,
et al.,

Plaintiffs,

v.

08 CIV 3719 (AKH)

UNITED AIRLINES, INC., et al.,

Defendants

-----X
WORLD TRADE CENTER PROPERTIES LLC,
et al.,

Plaintiffs,

v.

08 CIV 3722 (AKH)

AMERICAN AIRLINES, INC., et al.,

Defendants

-----X
BARCLEY DWYER CO., et al.,

Plaintiffs,

- against -

04 CIV 7136 (AKH)

AMR CORPORATION; , et al.,

Defendants.

-----X

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Terry Cummings, Esq.
sworn to on the 15th of March 2011, the exhibits annexed thereto, and upon all the pleadings
heretofore had herein, Petitioners, Hitchcock & Cummings, LLP and Joseph Herzfeld, LLP will

move this Court in Room 14D of the Southern District Court of the State of New York, 500 Pearl Street 10007, _____, for an Order pursuant to New York Judiciary Law §475, enforcing their charging lien against Karoon Management Capital, Inc.'s Settlement Amount, and for such other and further relief as the Court deems just and proper, together with the costs of this motion.

PLEASE TAKE FURTHER NOTICE, that this motion, having been timely served upon you, answering papers, if any, are to be served upon the undersigned pursuant to FRCP R 6(c)(1) within seven (7) days prior to the return date of this motion.

Dated: New York, New York
March 15, 2011

HITCHCOCK & CUMMINGS, LLP

By: 

Terry Cummings

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